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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON EUGENE DIVISION

| WILD,) Plaintiffs,) | AA |
|---------------------------------|----|
| Plaintiffs,) | |
| | |
|) JOINT STATUS REPORT | • |
| v.) | |
|) | |
| UNITED STATES FOREST SERVICE,) | |
| Defendant,) | |
|) | |

On January 18, 2022, the Parties jointly requested that the Court postpone the pre-trial order in this matter to allow the parties to engage in settlement discussions and mediation, ECF 30, and the Court so ordered, ECF No. 31. On February 28, 2022 mediation was held with Senior Judge Coffin. During mediation, the parties reached agreement on the merits of the case, but were not able to discuss attorney fees and costs. On March 14, the Court granted the Parties'

joint request to stay this matter and all associated deadlines until April 11, 2022, and directed the Parties to file a joint status report on that date. ECF No. 39.

The Parties have made substantial progress toward finalizing a written Settlement
Agreement reflecting the agreement reached at the mediation. The Parties have also made
progress on negotiating an agreement on attorneys' fees to include in the final Settlement
Agreement. The Parties are hopeful that they can settle Plaintiffs' demand for fees through
informal negotiations, but Judge Coffin represented at the mediation that, if a settlement on fees
cannot be reached informally, he remains available to assist and the parties may return to
mediation to try to resolve the fee issue short of coming back before this Court. Once the Parties
have reached an agreement on fees and finalized the language in a Settlement Agreement,
Defendant will proceed to obtaining the necessary final approvals, including approvals from the
relevant authorizing officials at the U.S. Department of Justice and U.S. Department Agriculture.

Accordingly, the Parties respectfully request that the Court stay this matter and all associated deadlines for an additional 60 days, until June 10, 2022. If the Parties have not finalized an agreement by that date they will file a joint status report updating the Court on the status of negotiations on or before June 10, 2022.

Respectfully submitted this 11th day of April, 2022.

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/s/ Emma L. Hamilton
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